

Message

From: Praskins, Wayne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4F47BC0A2C2E42A98347D59CD1A98B19-WPRASKIN]
Sent: 10/31/2019 12:19:14 AM
To: Walker, Stuart [Walker.Stuart@epa.gov]
Subject: HPNS Navy BPRG runs
Attachments: HPNS Structures BPRG Inputs and Results_1Oct19.xlsx; HPNS Structures BPRG Inputs and Results_1Oct19_WP.xlsx; Resident_bprg_01OCT2019_All ROCs_EPA defaults_sec eq no decay.pdf; Resident_bprg_01OCT2019_Am Pu Ra Th U at 20 pct RG_adjust FQa SAa SAc_sec eq no decay.pdf; Resident_bprg_01OCT2019_Am Pu Ra Th U at RG_adjust FQa SAa SAc_sec eq no decay.pdf; Resident_bprg_01OCT2019_Co Cs Eu H Sr at 20 pct RG_adjust HL FQa SAa SAc_progeny with decay.pdf; Resident_bprg_01OCT2019_Co Cs Eu H Sr at RG_adjust HL FQa SAa SAc_progeny with decay.pdf

Stuart –

Attached are the BPRG files that the Navy has provided to date as part of their HPNS evaluation. Jana Dawson with Techlaw has taken over from Lyndsey as the primary reviewer. Please call if you would like to discuss.

Wayne Praskins | Superfund Project Manager
U.S. Environmental Protection Agency Region 9
75 Hawthorne St. (SFD-7-3)
San Francisco, CA 94105
415-972-3181

From: Walker, Stuart <Walker.Stuart@epa.gov>
Sent: Wednesday, October 30, 2019 3:33 PM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>; Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>; Cooke, Maryt <Cooke.Maryt@epa.gov>; Young, Dianna <Young.Dianna@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>
Cc: Chesnutt, John <Chesnutt.John@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Gervais, Gregory <Gervais.Gregory@epa.gov>; Yap-deffler, Yazmine <Yap-Deffler.Yazmine@epa.gov>; Laija, Emerald <Laija.Emerald@epa.gov>
Subject: RE: Time Critical: Closing the loop on R9 draft soils letter HP

I would still like to see the package now. I didn't realize the Navy had actually sent BPRG runs as well as their RESRAD Build runs. This will take awhile to go through and waiting may delay my review. Who does Region 9 have looking at this since Lyndsey has moved on?

Stuart Walker
Superfund Remedial program National Radiation Expert
Science Policy Branch
Assessment and Remediation Division
Office of Superfund Remediation and Technology Innovation
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From: Walker, Stuart
Sent: Wednesday, October 30, 2019 12:46 PM
To: Praskins, Wayne <Praskins.Wayne@epa.gov>; Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>; Cooke, Maryt <Cooke.Maryt@epa.gov>; Young, Dianna <Young.Dianna@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>
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<Laija.Emerald@epa.gov>

Subject: RE: Time Critical: Closing the loop on R9 draft soils letter HP

If the Navy has actually done BPRG runs and provided a technical rationale to begin consultation I would like to see that now.

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From: Praskins, Wayne <Praskins.Wayne@epa.gov>

Sent: Wednesday, October 30, 2019 12:16 PM

To: Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>; Walker, Stuart <Walker.Stuart@epa.gov>; Cooke, Maryt <Cooke.Maryt@epa.gov>; Young, Dianna <Young.Dianna@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>
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Subject: RE: Time Critical: Closing the loop on R9 draft soils letter HP

We are reviewing a package containing BPRG and RESRAD BUILD files that the Navy provided to the Region earlier this month. I'll talk with Mary about whether FFRRO/OSRTI would like us to send the Navy package now or wait for the Region to complete an initial review. The package includes a report and about 19 supporting files documenting the Navy's RESRAD BUILD and BPRG simulations.

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From: Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>

Sent: Wednesday, October 30, 2019 9:08 AM

To: Walker, Stuart <Walker.Stuart@epa.gov>; Cooke, Maryt <Cooke.Maryt@epa.gov>; Young, Dianna <Young.Dianna@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>
Cc: Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Gervais, Gregory <Gervais.Gregory@epa.gov>; Yap-deffler, Yazmine <Yap-Deffler.Yazmine@epa.gov>; Laija, Emerald <Laija.Emerald@epa.gov>
Subject: RE: Time Critical: Closing the loop on R9 draft soils letter HP

Mary is talking to Wayne P, the RPM, this pm re: a consultation. Don't think the Navy has provided materials for a consultation thus far.

From: Walker, Stuart <Walker.Stuart@epa.gov>

Sent: Wednesday, October 30, 2019 11:27 AM

To: Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>; Cooke, Maryt <Cooke.Maryt@epa.gov>; Young, Dianna <Young.Dianna@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>
Cc: Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Gervais, Gregory <Gervais.Gregory@epa.gov>; Yap-deffler, Yazmine <Yap-

Deffler.Yazmine@epa.gov>; Laija, Emerald <Laija.Emerald@epa.gov>

Subject: RE: Time Critical: Closing the loop on R9 draft soils letter HP

Has anyone heard if the Navy is actually going to come in with a technical rationale for their RESRAD Build request to start an actual consultation?

Stuart Walker

Superfund Remedial program National Radiation Expert

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From: Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>

Sent: Wednesday, October 30, 2019 11:24 AM

To: Cooke, Maryt <Cooke.Maryt@epa.gov>; Walker, Stuart <Walker.Stuart@epa.gov>; Young, Dianna <Young.Dianna@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>

Cc: Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Gervais, Gregory <Gervais.Gregory@epa.gov>; Yap-deffler, Yazmine <Yap-Deffler.Yazmine@epa.gov>; Laija, Emerald <Laija.Emerald@epa.gov>

Subject: RE: Time Critical: Closing the loop on R9 draft soils letter HP

I also forwarded to Dana, who will look (may have found?) Dianna re this matter.

From: Cooke, Maryt <Cooke.Maryt@epa.gov>

Sent: Wednesday, October 30, 2019 11:22 AM

To: Walker, Stuart <Walker.Stuart@epa.gov>; Young, Dianna <Young.Dianna@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>

Cc: Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Gervais, Gregory <Gervais.Gregory@epa.gov>; Yap-deffler, Yazmine <Yap-Deffler.Yazmine@epa.gov>; Laija, Emerald <Laija.Emerald@epa.gov>; Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>

Subject: RE: Time Critical: Closing the loop on R9 draft soils letter HP

Thanks, Stuart. This is helpful.

From: Walker, Stuart <Walker.Stuart@epa.gov>

Sent: Wednesday, October 30, 2019 11:19 AM

To: Young, Dianna <Young.Dianna@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>

Cc: Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Gervais, Gregory <Gervais.Gregory@epa.gov>; Yap-deffler, Yazmine <Yap-Deffler.Yazmine@epa.gov>; Laija, Emerald <Laija.Emerald@epa.gov>; Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>; Cooke, Maryt <Cooke.Maryt@epa.gov>

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NOTE: The Navy never sent the material (basically risk runs with RESRAD Build and the BPRG calculator with a technical justification for why they wanted to switch) to begin a risk assessment consultation under Q&A guidance. In earlier discussions the Navy did not have a scientific rationale for wanting to switch, it was more economic. See some screenshots on the consultation process at this URL

<https://semspub.epa.gov/work/HQ/176329.pdf>

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To avoid unnecessary inconsistency between radiological and chemical risk assessment at the same site, users should generally use the same model for chemical and radionuclide risk assessment. If there is a reason on a site-specific basis for using another model justification for doing so should be developed. The justification should include specific supporting data and information in the administrative record. The justification normally would include the model runs using both the recommended EPA PRG model and the alternative model. Users are cautioned that they should have a thorough understanding of both the PRG recommended model and any alternative model when evaluating whether a different approach is appropriate. When alternative models are used, the user should adjust the default input parameters to be as close as possible to the PRG inputs, which may be difficult since models tend to use different definitions for parameters. Numerous computerized mathematical models have been developed by EPA and other organizations to predict the fate and transport of radionuclides in the environment; these models include single-media unsaturated zone models (for example, groundwater transport) as well as multi-media models. These models have been designed for a variety of goals, objectives, and applications; as such, no single model may be appropriate for all site-specific conditions. Generally, even when a different model is used to predict fate and transport of radionuclides through different media, EPA recommends using the PRG calculators for the remedial program to establish the risk-based concentrations to ensure consistency with CERCLA, the NCP and EPA's Superfund guidance for remedial sites.

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Q10. For CERCLA risk assessments at remedial sites, is it appropriate to use guidance or approaches developed by other Federal, State or Tribal Agencies or by International or National Organizations?

A. EPA has made the policy decision that risks from radionuclide exposures at remedial sites should be estimated in the same manner as chemical contaminants, which is consistent with EPA's remedial program implementing guidance (e.g., EPA 1997g, 1999d, 2000f). Consequently, approaches that do not follow the remedial program's policies and guidance should not be used at CERCLA remedial sites. Should regional staff have questions, they should consult with the Superfund remedial program's National Radiation Expert (Stuart Walker of OSRTI at the time this fact sheet was issued, at (703) 603-8748 or walker.stuart@epa.gov), before using guidance from other organizations that is not already incorporated into this and other EPA Superfund remedial program guidance. The current Superfund remedial program's National Radiation Expert will be listed on the Superfund Radiation webpage at: <http://www.epa.gov/superfund/health/contaminants/radiation/index.htm>.

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From: Young, Dianna <Young.Dianna@epa.gov>

Sent: Wednesday, October 30, 2019 10:43 AM

To: Herrera, Angeles <Herrera.Angeles@epa.gov>

Cc: Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda

<Sanchez.Yolanda@epa.gov>; Gervais, Gregory <Gervais.Gregory@epa.gov>; Yap-deffler, Yazmine <[\[Deffler.Yazmine@epa.gov\]\(mailto:Deffler.Yazmine@epa.gov\)>; Laija, Emerald <\[Laija.Emerald@epa.gov\]\(mailto:Laija.Emerald@epa.gov\)>; Walker, Stuart <\[Walker.Stuart@epa.gov\]\(mailto:Walker.Stuart@epa.gov\)>; Fitz-](mailto:Yap-</p></div><div data-bbox=)

James, Schatzi <Fitz-James.Schatzi@epa.gov>; Cooke, Maryt <Cooke.Maryt@epa.gov>

Subject: Re: Time Critical: Closing the loop on R9 draft soils letter HP

Angeles

To the best of my knowledge, we did not get feedback from Dana regarding the Region's draft response to the Navy soils addendum. It is my understanding that Stuart had no further comments. OSRTI, please confirm or correct that.

I apologize for the delay in getting back to you regarding the consultation. Wayne should expect to hear from Mary Cooke today about that.

I am attending the ASTSWMO annual meeting today and tomorrow morning but am attending to email. Please let me know if you have questions or concerns.

Dianna

On Oct 28, 2019, at 7:01 PM, Herrera, Angeles <Herrera.Angeles@epa.gov> wrote:

Did you hear anything from Dana Stalcup? We just want to make sure both Greg and Dana are on board position outlined in our letter.

Also, on Oct 9, we sent Greg the formal request for consultation on the building remediation goals including the Navy's request to use RESRAD tool. Any update on that?

Thanks!
Angeles

Sent from my iPhone

On Oct 18, 2019, at 12:24 PM, Young, Dianna <Young.Dianna@epa.gov> wrote:

Angeles,

FFRRO and OSRTI have coordinated on the review of Region 9 comments regarding the Navy's draft soils letter. We suggest one clarification, as follows:

For this review, EPA focused its review to the PRG calculations. This is EPA's preferred approach for developing preliminary remediation goals and assessing remediation goals for contaminated soil, air, and water at Superfund cleanups.

Apologies for the delay. Let me know if you have any questions or comments.

Thanks,
Dianna